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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)

SERVICE EMPLOYEES INTERNATIONAL
UNION NATIONAL INDUSTRY PENSION
FUND; MIKE GARCIA, Trustee; ROD
BASHIR, Trustee; CHARLES RIDGELL,
Trustee; SHARLEEN STEWART, Trustee;
STEVEN FORD, Trustee; EDWARD J.
MANKO, Trustee; JOHN J. SHERIDAN,
Trustee; LARRY T. SMITH, Trustee; FRANK
A. MAXSON, Trustee,

Plaintiffs,

vs.

LONE TREE CONVALESCENT HOSPITAL,
INC., a California corporation,

Defendant.

CASE NO.: CV 11-00484 LB

**REQUEST FOR CONTINUANCE OF
CASE MANAGEMENT CONFERENCE
AND ~~PROPOSED~~ ORDER**

Date: Thursday, May 19, 2011
Time: 10:30 a.m.
Judge: Magistrate Judge Laurel Beeler
Courtroom 4

Plaintiffs hereby submit their Request for Continuance of Case Management Conference currently scheduled for Thursday, May 19, 2011 at 10:30 a.m.

- The Complaint in this matter was filed on February 1, 2011 for Defendant's failure to pay employee pension contributions owing to Plaintiff Service Employee International Union National Industry Pension Fund for the period September 2005 through the present.

- 1 - REQUEST FOR CONTINUANCE OF CASE
MANAGEMENT CONFERENCE; ~~PROPOSED~~ ORDER
CASE NO. CV 11-00484 LB

2. The Summons and Complaint was served on Defendant Lone Tree Convalescent Hospital, Inc. on March 11, 2011.
3. The parties are currently in settlement discussions concerning Defendant's payment of the delinquent amounts due on a payment schedule.
4. The parties hope to resolve all of the above issues and reach settlement of this matter within the next sixty (60) days.
5. Therefore, there is nothing for the Court to consider at this time.
6. Plaintiffs therefore respectfully request that, in order to minimize costs and fees in this action and allow the parties to finalize settlement of this matter, the Case Management Conference be continued for a period of at least sixty (60) days.

Date: May 12, 2011


SALTZMAN & JOHNSON LAW CORPORATION

By: /S/
Kimberly A. Hancock
Attorneys for Plaintiffs

IT IS SO ORDERED.

Based on the foregoing, and for GOOD CAUSE appearing, the Case Management Conference currently set for Thursday, May 19, 2011 at 10:30 a.m. is hereby continued to August 11, 2011 at 10:30 a.m.

Date: May 17, 2011


The Honorable Laurel Beeler
Magistrate Judge, United States District Court